

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH CAROLINA –
WESTERN DISTRICT

Civil Action No. 3:15-CV-00366

FILED
CHARLOTTE, NC

JAN 11 2016

U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

DUGAN, et. al,

Plaintiffs,

v.

INVICTUS ASSET MANAGEMENT, LLC, INVICTUS
CAPITAL GROWTH AND INCOME FUND, LLP
INVICTUS HOLDINGS, LLP, TRADEDESK CAPITAL LLC,
TRADEDESK FINANCIAL GROUP, INC., TRADESTREAM
ANALYTICS, LTD., INVICTUS INCOME FUND, LLP,
DAVID W. SCHAMENS, PHILLIPS WIEGAND JR.,
PILIANA M. SCHAMENS, INVICTUS REAL ESTATE
INVESTMENT, LLP, et. al.

Defendants.

**MOTION FOR EXTENSION OF TIME TO FILE ANSWER AND RETAIN
COUNSEL FOR CORPORATE ENTITIES**

Defendants David W. Schamens and Invictus Real Estate Investment, LLP, individually and as General Partner and sole partner of Invictus Real Estate Investment, LLP, Tradedesk Financial Group, Inc., TradeDesk Capital, LLC and Tradestream Analytics, Ltd., defendants Piliana M. Schamens, individually and as Managing Member of the General Partner of Invictus Capital Growth and Income Fund, LLP and Invictus Income Fund, LLP, and as Member of Invictus Asset Management and the General Partner of Invictus Holdings, LLP moves the Court, pursuant to Federal Rules of Civil Procedure, for an extension of time to respond to Plaintiff's Complaint (the "Complaint") on the grounds that the defendants need additional time to investigate and prepare and an adequate Response as well as retain counsel.

This Motion is made in good faith, not for the purposes of delay and is filed prior to the expiration of the time originally prescribed to respond to the Complaint.

Dated: January 11, 2016

By: 

Piliana M. Schamens

Managing Member of the General Partner of ,
INVICTUS CAPITAL GROWTH AND INCOME
FUND, LLP, INVICTUS INCOME FUND, LLP,
INVICTUS HOLDINGS, LLP

Member

INVICTUS ASSET MANAGEMENT, LLC

piliana@tradestreamanalytics.com

Tel.: (212) 537-6163

By: 

David W. Schamens

Managing Director of the Managing Member,
TRADEDESK CAPITAL, LLC

Managing Director

TRADEDESK FINANCIAL GROUP, INC.

TRADESTREAM ANALYTICS, LTD.

General Partner

INVICTUS REAL ESTATE INVESTMENT, LLP

dschamens@tradestreamanalytics.com

Tel.: (212) 537-6867